

EXHIBIT I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

SEAN STEWART and ROBERT STEWART,
Defendants.

S1 15 Cr. 287 (LTS)

**[PROPOSED] ORDER
TO GOVERNMENT TO
SUBMIT BILL OF PARTICULARS**

WHEREAS, by motion dated September 18, 2015, defendant Sean Stewart (“Defendant”) applied for an order compelling the government to submit a bill of particulars as to certain allegations in the Superseding Indictment in this case (“Indictment”) relating to the elements of breach of fiduciary duty and materiality;

UPON DUE CONSIDERATION,

THE GOVERNMENT IS HEREBY ORDERED AS FOLLOWS:

1. With respect to each allegation in the Indictment that Defendant provided “material nonpublic information” to others, provide a bill of particulars that:
 - a. Describes the information that was allegedly shared by Defendant;
 - b. Identifies the date and time such information was shared by Defendant; and
 - c. The means by which such information was shared by Defendant.
2. With respect to each allegation in the Indictment that Defendant breached or violated any “duties,” “fiduciary duties,” or “other duties of trust and confidence owed to the sources of the information,” provide a bill of particulars that:
 - a. Describes the nature of each of the alleged duties;

- b. Describes the law, agreement, relationship or any other bases that the government alleges gave rise to each of the alleged duties;
 - c. Identifies each person or entity to whom each such duty was owed by Defendant;
 - d. Describes Defendant's conduct that is alleged to constitute each alleged breach;
 - e. States whether the government contends Defendant provided material nonpublic information in expectation of a "personal benefit;"
 - f. Identifies any and all "personal benefit" Defendant is alleged to have expected or sought in exchange for providing material nonpublic information; and
 - g. Identifies any and all "personal benefit" Defendant is alleged to have received in exchange for providing material nonpublic information.
3. The government shall comply with this Order within 3 days.

SO ORDERED:

Dated: _____, 2015

Hon. Laura T. Swain
United States District Judge